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February 27, 2009

BY ELECTRONIC FILING

Marlene H. Dortch, Secretary Office of the Secretary Federal Communications Commission 445 12th Street, SW, Suite TW-A325 Washington, DC 20554

EB Docket No. 06-36

Re: AMENDED CERTIFICATION OF CPNI COMPLIANCE FILING

> Salina-Spavinaw Telephone Company, Inc. 499 Filer ID # 808796 SST Long Distance Company, Inc. 499 Filer ID # 818176

Dear Ms. Dortch:

On behalf of Salina-Spavinaw Telephone Company, Inc. and its affiliate, listed above, John Staurulakis (JSI), their consultant is filing the attached Amended 2008 Annual CPNI Certification together with an amended statement of procedures for operational compliance with FCC's CPNI rules. The amendments to the original filings made on January 21, 2009, serve to add SST Long Distance Company, Inc. to the affiliates covered by the CPNI certification. You may direct any questions regarding the CPNI compliance efforts of Salina-Spavinaw Telephone Company, Inc. and its affiliate to the undersigned.

Sincerely,

Scott Duncan

JSI Staff Director-Regulatory Affairs sduncan@jsitel.com

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Attachment

cc: Best Copy and Printing, Inc. via email to fcc@bcpiweb.com

SALINA SPAVINAW TELEPHONE COMPANY, INC.

7136 S. Yale, Suite 208 Tulsa, OK 74136

Annual 47 C.F.R. § 64.2009(e) CPNI Certification EB Docket 06-36

AMENDED Annual 64.2009(e) CPNI Certification for 2008¹

Date signed: February 27, 2009

Name of Company Covered by this Certification:499 Filer IDSalina-Spavinaw Telephone Company, Inc.808796SST Long Distance Company, Inc.818176

Name of signatory: Deborah K. Ailey

Title of signatory: Assistant Vice President

I, Deborah K. Ailey,, certify that I am an officer of the affiliated companies named above (collectively and individually "Company") and, acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the CPNI rules of the Federal Communications Commission ("Commission"). See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The Company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in 2008. The Company is not aware of any attempts by pretexters to access the CPNI of Company customers and thus has not had to take any actions against data brokers. The Company has taken steps to protect CPNI from unauthorized access and has described these steps in the accompanying statement.

The Company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

I hereby certify that the statements contained within this certification and the accompanying statement are accurate, complete and in accordance with Commission rules.

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Attachment

This amended certification replaces the original certification filed with the Commission by ECFS on January 21, 2009 in order to add SST Long Distance, Inc. to the accompanying statement consistent with inclusion on the original certification.

SALINA-SPAVINAW TELEPHONE COMPANY, INC.

Salina-Spavinaw Telephone Company, Inc. 499 Filer ID 808796 SST Long Distance Company, Inc. 499 Filer ID 818176

7136 S. Yale, Suite 208 Tulsa, OK 74136

AMENDED 2008 ANNUAL STATEMENT OF FCC CPNI RULE COMPLIANCE¹ February 27, 2009

This statement accompanies the 2008 Customer Proprietary Network Information ("CPNI") Certification for Salina-Spavinaw Telephone Company, Inc. and its affiliate SST Long Distance Company, Inc. (collectively or individually "Company") as required by Section 64.2009(e) of the Federal Communications Commission's ("FCC's") rules, for the purpose of explaining how the operating procedures of the Company ensure compliance with Part 64, Subpart U of the FCC's rules. See 47 C.F.R. § 64.2001 et seq.

All subsequent references to rule Sections refer to rules under Part 64, Subpart U unless indicated otherwise.

1. Identification of CPNI

The Company has established procedures and trained employees having access to, or occasion to use customer data, to identify what customer information is CPNI consistent with the definition of CPNI under the Section 64.2003(g) and Section 222(f)(1) of the Communications Act of 1934 as amended (47 U.S.C. § 222(f)(1)).

2. Identification of Services Affected by CPNI Rules

The Company has established procedures and trained employees to recognize the different types of telecommunications and non-telecommunications services that affect how the Company uses CPNI.

3. Identification of Permissible Uses of CPNI without Customer Authorization

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI <u>not</u> requiring customer authorization under Section 64.2005.

4. Identification of Uses of CPNI Requiring Customer Authorization

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI requiring customer authorization under Section 64.2007.

5. Customer Notification and Authorization Process

The Company has established procedures, and trained employees responsible for obtaining customer authorization to use CPNI for marketing purposes, regarding the notice and approval requirements under Section 64.2008. The Company has complied with the notice requirements for Opt-Out. The Company does not provide CPNI to other parties and thus has not used the optin approval process.

This "Amended 2008 Annual Statement of FCC CPNI Rule Compliance" serves to amend the original filed with the Commission by ECFS on January 21, 2009 in order to add SST Long Distance, Inc. Although SST Long Distance, Inc. appeared on the original certification, the accompanying statement did not include it. The Company's marketing efforts, customer service operations and customer database management systems are integrated and thus SST Long Distance, Inc. has been at all times covered by the procedures indicated in this document.

6. Record of Customer CPNI Approval/Non-Approval

The Company has developed and utilizes a system for maintaining readily accessible record of whether and how a customer has responded to Opt-Out approval as required by Section 64.2009(a).

7. Procedures Protecting Against Disclosure of CPNI

The Company has implemented procedures for compliance with new Section 64.2010 including, but not limited to the following:

Authentication of customers before disclosing CPNI on customer-initiated telephone contacts or business office visits.

The Company provides customers with on-line access to customer account information for which the Company has initiated procedures to control access in compliance with Section 64.2010(c) comprising authentication through a password established in compliance with Section 64.2010(e).

The Company has implemented password back-up authentication procedures in compliance with Section 64.2010(e).

The Company has implemented procedures to notify customers of account changes.

8. Actions Taken Against Data Brokers and Responses to Customer Complaints

Pursuant to Section 64.2009, the Company makes the following explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI:

Not applicable. No actions taken against data-brokers.

No customer complaints received.

9. Disciplinary Process

The Company has in place an express disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required under Section 64.2009(b).

10. Supervisory Review Process for Outbound Marketing

The Company has established a supervisory review process regarding its compliance with the rules for outbound marketing situations as required in Section 64.2009 (c) and (d). Prior to any outbound marketing effort, sales personnel must obtain supervisory approval of the proposed outbound marketing use. Any approval of CPNI use for outbound marketing efforts is limited to CPNI not requiring prior customer authorization or, where prior customer authorization is required, CPNI of customers having given the Company prior approval. The Company maintains records of its compliance for a minimum of one year.

11. Procedures for Notifying Law Enforcement of CPNI Security Breaches

The Company has adopted procedures to comply with Section 64.2011 for notifying law enforcement of CPNI security breaches, together with related recordkeeping and deferred notification to customers.